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March 13, 2017

VIA ECF
Hon. Anne Y. Shields
United States District Court
100 Federal Plaza
Central Islip, NY 11720

Re: Vis Vires Group, Inc. v. Endonovo Therapeutics Inc., et al
US EDNY Case No.: cv-16-0470

Dear Judge Shields:

This office represents Vis Vires Group, Inc. ("VVG") the plaintiff in the above entitled action. Pursuant to the Order of January 26, 2017 I have attempted to confer with counsel for the defendants to ascertain what discovery if any they require, however, I have not received any response.

As far as plaintiff is concerned, we do not believe any further discovery is necessary as the case is essentially one to recover on a defaulted Convertible Promissory Note. Accordingly, we are writing to the District Court Judge to request a pre-motion conference seeking summary judgment against the corporate defendant and discontinuance against the individual defendant without prejudice to eliminate any potential triable issues of fact.

Respectfully yours,

Robert P. Johnson

RPJ:ael
cc: Ellsworth & Young, LLP (via ecf and e-mail)